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JIN MING LIN, CHI WAI CHAO,)	
YOOK THAI CHEAH, MING F. FUNG,)	
MUOI GIANG, YUEN YUE SOOHOO,)	
and MEI ZHI,)	
)	
Plaintiffs,)	Civil Action No. 09-11510-GAO
v.)	
)	
CHINATOWN RESTAURANT CORP.,)	
and JOYCE P.Y. HAYES,)	
)	
Defendants.)	
)	

Defendants will likely introduce evidence that one former employee, a waitress named Bao Li, had filed a small claims action for unpaid wages against Defendants and that the employee lost. Because Bao Li is not a party to this action and because the jury in this case will be required to make an independent determination of the issues in this case, the Court should preclude reference to the *Bao Li* litigation. Evidence of this prior litigation is wholly irrelevant to the strict liability questions regarding the unpaid wages claim in this case.

Any mentioning or referencing of the *Bao Li* litigation should be precluded because it is irrelevant, unduly prejudicial, confusing, and inappropriate with regard to the jury's liability and damages determinations.

RESPECTFULLY SUBMITTED,

For Plaintiffs

By their attorneys,

/s/ Myong J. Joun

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Dated: October 19, 2012

CERTIFICATE OF SERVICE

I certify that on this day I caused a true copy of the above document to be served upon the attorney of record for all parties via CM/ECF.

Date: 10/19/2012 /s/Myong J. Joun
Myong J. Joun